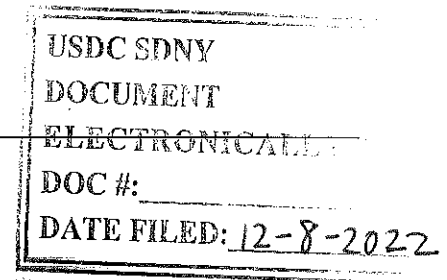


MEMO ENDORSED

KIRTON LAW FIRM



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December 6, 2022

VIA ELECTRONIC MAIL
EX PARTE

Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Heaven West*, 21 cr. 729 (LAK)

Dear Judge Kaplan:

I represent Heaven West in the above-referenced matter. I request the appointment of associate counsel pursuant to the Criminal Justice Act (CJA). This Court scheduled a jury trial for January 17, 2023.

BACKGROUND

A Grand Jury indicted Ms. West on one count of wire fraud and one count of conspiracy to commit wire fraud. Ms. West faces a thirty-year sentence. A multiple-defendant trial is scheduled for January 17, 2023. The Government has turned over the Rule 16 discovery.

ASSOCIATE COUNSEL

I request that this Court appoint Emilee A. Sahli as my associate counsel.¹ Ms. Sahli has over eight years of experience in complex criminal cases in the Southern District of New York. She is an attorney admitted to practice in New York State and the Southern District of New York. She is a 2016 City University of New York Law School (CUNY) graduate. She was on CUNY's Law Review and a member of the Criminal Defense Clinic. She has worked for the past

¹ Please see the attached cv.

eight years with Emma Greenwood of the Greenwood Law Group, PLLC.² She has worked on several high-profile cases in the Southern District of New York. I have worked with her in *United States v. Alexei Saab*, 19 cr. 676 (PGG).³ I have worked with her on other cases as Associate counsel in the Southern District of New York. Ms. Sahli is in the CJA Mentoring program in the Eastern District of New York. Ms. Sahli will assist me with pretrial preparation. She will help me with organizing the Rule 16 discovery, compiling exhibits, consulting with Ms. West, and consulting with me on all matters concerning this case. Given the volume of discovery and the complexity of conducting a fraud trial in the Southern District of New York, Ms. Sahli's services are necessary within the meaning of 18 USC 3006A.

PROPOSED ORDER

I request that Ms. Sahli be compensated at \$90.00 per hour for 50 hours. The hourly rate is reasonable and is in line with the rates suggested by the Second Circuit for Associate Counsel.⁴ The discovery, in this case, is voluminous, and the case is complex. I will create a trial budget if necessary.

Please contact me if you have any questions or concerns.

Sincerely,

Marlon Kirton
Marlon G. Kirton, Esq.

Granted
SO ORDERED
[Signature]
LEWIS A. KAPLAN, USDJ
12/8/22

² Ms. Sahli has started her own law firm.

³ Mr. Saab is charged with providing material support to a designated foreign terrorist organization.

⁴ Second Circuit Policy and Procedure Manual, Appendix E.